

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DEMOCRATIC NATIONAL
COMMITTEE, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Defendants.

Case No. 1:25-cv-00952

**ANSWER TO PLAINTIFFS' COMPLAINT FOR DECLARATORY AND INJUNCTIVE
RELIEF**

Defendants President Donald J. Trump, the Executive Office of the President, the U.S. Election Assistance Commission, the U.S. Department of Justice, the U.S. DOGE Service, the U.S. Department of State, the U.S. Department of Homeland Security, the U.S. Department of Defense, the U.S. Department of Veterans Affairs, the U.S. Small Business Administration, the U.S. Department of the Interior, the Social Security Administration, Commissioner Benjamin W. Hovland, Commissioner Donald L. Palmer, Commissioner Thomas Hicks, Commissioner Christy McCormick, Attorney General Pamela Bondi, Administrator Amy Gleason, Secretary Marco Rubio, Secretary Kristi Noem, Secretary Peter B. Hegseth, Secretary Douglas A. Collins, Administrator Kelly Loeffler, Secretary Doug Burgum, and Secretary Leland Dudek, by and through their attorneys, answer Plaintiffs' Complaint For Declaratory and Injunctive Relief, ECF No. 1, as follows:

1. This paragraph is a legal conclusion, which requires no response.

2. This paragraph contains a citation to and characterization of Federalist No. 51 to which Defendants refer for its complete and accurate contents.

3. This paragraph consists of citations to and characterizations of the U.S. Constitution, Federalist No. 59, and a Supreme Court opinion, to which Defendants refer for their complete and accurate contents.

4. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also includes legal conclusions, which require no response.

5. This paragraph cites and characterizes the Executive Order and a judicial opinion to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

6. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of a legal conclusion, which requires no response.

7. This paragraph cites judicial opinions to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

8. This paragraph cites a judicial opinion to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

9. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also consists of legal conclusions to the extent it characterizes the Executive Order as unlawful.

10. This paragraph consists of a legal conclusion, to which no response is required.

11. This paragraph consists of a legal conclusion, to which no response is required.

12. Defendants lack knowledge or information sufficient to form a belief about the truth

of the allegations in this paragraph.

13. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

14. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

15. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

16. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

17. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

18. Defendants admit the first and second sentence of this paragraph and that President Trump issued the Executive Order on March 25, 2025. The remaining allegations consist of legal conclusions and characterize the Executive Order to which Defendants refer for its complete and accurate contents.

19. The first sentence of this paragraph consists of a legal conclusion, to which no response is required. Defendants admit the second and third sentences.

20. Admitted.

21. This paragraph cites an Executive Order to which Defendants refer for its complete and accurate contents. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence of this paragraph. Defendants admit the third sentence.

22. Admitted.

23. Admitted.

24. Defendants admit the first and third sentences. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

25. Defendants admit the first and third sentences. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

26. Defendants admit the first and third sentences. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

27. Defendants admit the first and third sentences. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

28. Admitted.

29. This paragraph cites a judicial decision, to which Defendants refer for its complete and accurate contents, and consists of a legal conclusion, which requires no response.

30. This paragraph cites a judicial decision, to which Defendants refer for its complete and accurate contents.

31. This paragraph cites a judicial decision, to which Defendants refer for its complete and accurate contents.

32. This paragraph consists of a legal conclusion, which requires no response and cites a judicial decision, to which Defendants refer for its complete and accurate contents.

33. This paragraph cites a judicial decision, to which Defendants refer for its complete and accurate contents.

34. This paragraph characterizes Plaintiffs' complaint and cites the U.S. Constitution, to which Defendants refer for its complete and accurate contents.

35. This paragraph consists of a legal conclusions, which require no response and cites

a judicial decision, to which Defendants refer for its complete and accurate contents.

36. This paragraph cites and characterizes a judicial decision, to which Defendants refer for its complete and accurate contents.

37. This paragraph cites a judicial decision, to which Defendants refer for its complete and accurate contents.

38. This paragraph consists of legal conclusions, which require no response, and cites the U.S. Constitution and judicial decisions to which Defendants refer for their complete and accurate contents.

39. This paragraph consists of legal conclusions, to which no response is required.

40. This paragraph cites federal statutes and a judicial opinion, to which Defendants refer for their complete and accurate contents.

41. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the first sentence of this paragraph. The rest of the paragraph cites judicial decisions to which Defendants refer for their complete and accurate contents.

42. This paragraph cites judicial decisions to which Defendants refer for their complete and accurate contents.

43. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. Footnote 1 consists of citations to state statutes and a report from the National Conference of State Legislatures to which Defendants refer for their complete and accurate contents.

44. This paragraph consists of legal conclusions, which require no response. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the last sentence of this paragraph.

45. This paragraph consists of citations to and characterizations of state statutes and legislative materials to which Defendants refer for their complete and accurate contents.

46. This paragraph contains citations to the legislative materials and a state statute, to which Defendants refer for their complete and accurate contents. The last sentence of this paragraph consists of a legal conclusion, which requires no response.

47. This paragraph cites and characterizes a judicial opinion and legislative materials to which Defendants refer for their complete and accurate contents.

48. This paragraph cites briefing filed by the United States to which Defendants refer for its complete and accurate contents.

49. The first sentence of this paragraph is a legal conclusion, which requires no response. The remainder of the paragraph cites federal statutes and legislative materials to which Defendants refer for their complete and accurate contents.

50. The first sentence of this paragraph is a legal conclusion, which requires no response. The remaining two sentences cite judicial decisions to which Defendants refer for their complete and accurate contents.

51. This paragraph and footnote 2 cite and characterize judicial decisions to which Defendants refer for their complete and accurate contents. It also consists of a legal conclusion, which requires no response.

52. This paragraph cites and characterizes judicial decisions to which Defendants refer for their complete and accurate contents.

53. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents, and it consists of legal conclusions, which require no response.

54. This paragraph cites to federal statutes to which Defendants refer for their complete

and accurate contents.

55. This paragraph characterizes federal statutes to which Defendants refer for their complete and accurate contents.

56. This paragraph cites legislative materials to which Defendants refer for their complete and accurate contents. Defendants admit that since 2018 the EAC has distributed over \$1 billion in congressionally appropriated Election Security Grants to the 50 states, five territories, and the District of Columbia. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the last sentence of this paragraph.

57. This paragraph cites and characterizes a web page, which Defendants refer to for its complete and accurate contents.

58. This paragraph cites statutes and legislative materials to which Defendants refer for their complete and accurate contents.

59. This paragraph consists of legal conclusions, which require no response, and cites federal statutes to which Defendants refer for their complete and accurate contents.

60. This paragraph consists of a legal conclusion, which requires no response, and cites a federal statute to which Defendants refer for its complete and accurate contents.

61. This paragraph consists of legal conclusions, which require no response, and cites judicial decisions to which Defendants refer for their complete and accurate contents.

62. This paragraph cites legislative materials to which Defendants refer for their complete and accurate contents.

63. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents.

64. The first sentence of this paragraph cites a federal statutes to which Defendants

refer for its complete and accurate contents. Defendants admit the second sentence.

65. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents.

66. This paragraph cites and characterizes a federal statutes to which Defendants refer for its complete and accurate contents.

67. The first sentence of this paragraph cites a federal statute to which Defendants refer for its complete and accurate contents. Defendants admit the second sentence. The third sentence is a legal conclusion, which requires no response, and cites a judicial decision to which Defendants refer for its complete and accurate contents.

68. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents.

69. This paragraph cites federal and state statutes, as well as an order from Michigan's governor, and an article to which Defendants refer for their complete and accurate contents.

70. This paragraph cites and characterizes a federal statute to which Defendants refer for its complete and accurate contents.

71. Defendants admit the first sentence of this paragraph. The remaining allegations in this paragraph characterize the Executive Order to which Defendants refer for its complete and accurate contents and consist of legal conclusions, which requires no response.

72. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph

73. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also includes legal conclusions, which require no response. Footnotes 9 and 10 cite a news article and a statement from Washington's Secretary

of State to which Defendants refer for their complete and accurate contents.

74. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It contains legal conclusions that require no response.

75. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

76. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

77. This paragraph consists of legal conclusions, which require no response, and cites judicial decisions, to which Defendants refer for their complete and accurate contents.

78. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

79. The first, second, and third sentences of this paragraph cite and characterize the Executive Order to which Defendants refer for its complete and accurate contents. The third and fourth sentences cite a news article and the DHS website to which Defendants refer for their complete and accurate contents.

80. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Footnote 13 cites Executive Order 14160 to which Defendants also refer for its complete and accurate contents.

81. This paragraph cites and characterizes the Executive Order and a federal statute to which Defendants refer for their complete and accurate contents.

82. This paragraph cites the Executive Order to which Defendants refer for its complete

and accurate contents.

83. This paragraph consists of legal conclusions, which require no response, and cites federal statutes to which Defendants refer for their complete and accurate contents.

84. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

85. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

86. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

87. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

88. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

89. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

90. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents.

91. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents.

92. This paragraph cites the Executive Order to which Defendants refer for its complete

and accurate contents.

93. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents.

94. This paragraph cites a federal statutes to which Defendants refer for its complete and accurate contents and consists of a legal conclusion, which requires no response.

95. This paragraph cites the federal statutes to which Defendants refer for their complete and accurate contents and consist of legal conclusions, which require no response.

96. This paragraph cites federal statutes and a judicial decision to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

97. This paragraph cites and characterizes the Executive Order and the Voluntary Voting System Guidelines 2.0 to which Defendants refer for their complete and accurate contents.

98. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents and consists of a legal conclusion, which requires no response.

99. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents and consists of a legal conclusion, which requires no response.

100. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

101. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

102. Defendants lack knowledge or information sufficient to form a belief about the truth

of the allegations in this paragraph.

103. This paragraph consists of a legal conclusion, which requires no response. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

104. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

105. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

106. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

107. The first sentence of this paragraph contains a legal conclusion, which requires no response. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. And this paragraph cites a Pew Research Center report to which Defendants refer for its complete and accurate contents.

108. This paragraph cites judicial decisions to which Defendants refer for their complete and accurate contents. It also contains legal conclusions, which require no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in the third sentence of this paragraph.

109. This paragraph consists of legal conclusions, to which no response is required.

110. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

111. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

112. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

113. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the first, second, fourth, and fifth sentences of this paragraph. The third sentence cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. The last sentence is a legal conclusion, which requires no response.

114. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

115. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph.

116. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the first sentence of this paragraph. The remaining allegations cite judicial decisions to which Defendants refer for their complete and accurate contents.

117. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

118. This paragraph consists of legal conclusions, which require no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

119. This paragraph consists of a legal conclusion, which requires no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

120. This paragraph characterizes the Executive Order to which Defendants refer for its

complete and accurate contents. It also consists of a legal conclusion, which requires no response.

121. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of a legal conclusion, which requires no response.

122. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. This paragraph also consists of a legal conclusion, which requires no response.

123. This paragraph cites judicial decisions to which Defendants refer for their complete and accurate contents. It also consists of a legal conclusion, which requires no response.

124. The first and fourth sentences in this paragraph consist of legal conclusions, which require no response. The second and fifth sentences characterize the Executive Order to which Defendants refer for its complete and accurate contents. The third and fourth sentences cite a judicial decision to which Defendants refer for its complete and accurate contents.

125. This paragraph consists of a legal conclusion, which requires no response.

126. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

127. This paragraph consists of citations to judicial decisions to which Defendants refer to for their complete and accurate contents.

128. This paragraph consists of citations to legal authorities, to which Defendants refer to for their complete and accurate contents, and legal conclusions, which require no response.

129. This paragraph consists of citations to judicial decisions, to which Defendants refer to for their complete and accurate contents, and legal conclusions, which require no response.

130. This paragraph consists of citations to legal authorities, to which Defendants refer to for their complete and accurate contents.

131. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

132. The first sentence is a legal conclusion, which requires no response. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

133. This paragraph consists of legal conclusions, to which no response is required. Defendants deny that Plaintiffs are entitled to any relief.

134. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

135. This paragraph consists of citations to the judicial decisions to which Defendants refer for their complete and accurate contents.

136. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order, judicial decisions, and federal statutes to which Defendants refer for their complete and accurate contents.

137. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order, as well as Executive Order 14215, to which Defendants refer for their complete and accurate contents.

138. This paragraph consists of legal conclusions, which require no response, and cites and characterizes judicial decisions to which Defendants refer for their complete and accurate contents.

139. This paragraph consists of legal conclusions, to which no response is required. It also cites a judicial decision to which Defendants refer for its complete and accurate contents.

140. This paragraph consists of legal conclusions, to which no response is required. It also cites judicial decisions to which Defendants refer for their complete and accurate contents.

141. This paragraph consists of legal conclusions, to which no response is required. It also cites judicial decisions and the Executive Order to which Defendants refer for their complete and accurate contents. Defendants deny that Plaintiffs are entitled to any relief.

142. This paragraph cites and characterizes a judicial opinion and the U.S. Constitution to which Defendants refer for their complete and accurate contents.

143. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

144. This paragraph cites and characterizes federal statutes, judicial opinions, and the Executive Order to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

145. This paragraph consists of a legal conclusion, which requires no response.

146. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

147. This paragraph consists of citations to the U.S. Constitution to which Defendants refer for its complete and accurate contents.

148. This paragraph contains citations to and characterizations of federal statutes, to which Defendants refer for their complete and accurate contents. Defendants admit that since 2018 the EAC has distributed over \$1 billion in congressionally appropriated Election Security Grants to the 50 states, five territories, and the District of Columbia.

149. This paragraph consists of a legal conclusion, which requires no response. It also cites federal statutes to which Defendants refer for their complete and accurate contents.

150. This paragraph consists of a legal conclusion, which requires no response. It also cites judicial decisions to which Defendants refer for their complete and accurate contents.

151. This paragraph cites and characterizes the Executive Order, to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

152. This paragraph consists of legal conclusions, which require no response.

153. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

154. This paragraph consists of a legal conclusion, which does not require a response.

155. This paragraph cites a judicial decision to which Defendants refer for its complete and accurate contents.

156. This paragraph is a legal conclusion, which requires no response.

157. This paragraph consists of legal conclusions, which require no response.

158. This paragraph is a legal conclusion, which requires no response. It also cites a judicial decision to which Defendants refer for its complete and accurate contents.

159. This paragraph consists of legal conclusions, which require no response. It also characterizes the Executive Order to which Defendants refer for its complete and accurate contents.

160. This paragraph consists of a legal conclusion, which requires no response.

161. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order and a judicial decision to which Defendants refer for their complete and accurate contents. Defendants admit that since 2018 the EAC has distributed over \$1 billion in congressionally appropriated Election Security Grants to the 50 states, five

territories, and the District of Columbia.

162. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes a judicial decision to which Defendants refer for its complete and accurate contents.

163. This paragraph consists of legal conclusions, which require no response.

164. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

165. This paragraph cites a federal statute to which Defendants refer for its complete and accurate contents.

166. This paragraph cites judicial decisions and another executive order to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

167. This paragraph consists of legal conclusions, which require not response. It also cites and characterizes the Executive Order and judicial decisions to which Defendants refer for their complete and accurate contents.

168. This paragraph consists of legal conclusions, which require no response. It also cites judicial decisions and federal statutes to which Defendants refer for their complete and accurate contents.

169. This paragraph consists of legal conclusions, which require no response. It also cites the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents.

170. This paragraph consists of legal conclusions, which require no response. The second sentence characterizes the Executive Order to which Defendants refer for its complete and

accurate contents. And Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence.

171. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

172. This paragraph cites a federal statute to which Defendants refer for its complete and accurate contents.

173. This paragraph consists of a legal conclusion, which requires no response.

174. This paragraph cites and characterizes the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

175. This paragraph cites and characterizes the judicial decisions and federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

176. This paragraph cites and characterizes the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents. Defendants also lack sufficient knowledge or information to form a belief about the truth of the allegations in the last sentence of this paragraph.

177. This paragraph cites and characterizes and federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

178. This paragraph consists of legal conclusions, which require no response.

179. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

180. This paragraph characterizes the APA to which Defendants refer for its complete and accurate contents.

181. This paragraph consists of a legal conclusion, which requires no response.

182. This paragraph cites the Executive Order and UOCAVA to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

183. This paragraph cites UOCAVA to which Defendants refer for its complete and accurate contents.

184. This paragraph consists of a legal conclusion, which requires no response.

185. This paragraph consists of legal conclusions, which requires no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in sentences three and four of this paragraph.

186. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

187. This paragraph characterizes the APA to which Defendants refer for its complete and accurate contents.

188. This paragraph cites and characterizes judicial decisions to which Defendants refer for their complete and accurate contents.

189. This paragraph characterizes a federal statute to which Defendants refer for its complete and accurate contents.

190. This paragraph cites and characterizes the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

191. This paragraph cites and characterizes the Executive Order and to which Defendants refer for its complete and accurate contents.

192. Defendants lack sufficient knowledge or information to form a belief about the truth of the assertions in this paragraph.

193. This paragraph cites judicial decisions and the Executive Order to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

194. This paragraph consists of a legal conclusion, which requires no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

195. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

196. This paragraph characterizes the APA to which Defendants refer for its complete and accurate contents.

197. This paragraph consists of a legal conclusion, which requires no response.

198. This paragraph characterizes the Privacy Act to which Defendants refer for its complete and accurate contents.

199. This paragraph cites and characterizes the Privacy Act to which Defendants refer for its complete and accurate contents.

200. This paragraph cites and characterizes judicial decisions to which Defendants refer for their complete and accurate contents. It also consists of a legal conclusion, which requires no response.

201. This paragraph cites a judicial decision to which Defendants refer for its complete

and accurate contents.

202. This paragraph characterizes and cites the Executive Order to which Defendants refer for its complete and accurate contents, and it consists of legal conclusions, which require no response.

203. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

204. This paragraph consists of legal conclusions, which require no response. It also cites judicial decisions and characterizes the Executive Order to which Defendants refer for their complete and accurate contents.

205. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

206. This paragraph characterizes the APA to which Defendants refer for its complete and accurate contents.

207. This paragraph cites and characterizes judicial decisions to which Defendants refer for their complete and accurate contents.

208. This paragraph characterizes and cites the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response. Defendants also lack knowledge and information sufficient to form a belief about the truth of the allegations in this paragraph.

209. This paragraph consists of legal conclusions, which require no response, and cites judicial decisions to which Defendants refer for their complete and accurate contents.

210. This paragraph consists of legal conclusions, which require no response. It also cites federal statutes and the Executive Order to which Defendants refer for their complete and

accurate contents.

211. This paragraph consists of legal conclusions, which require no response.

212. This paragraph consists of a legal conclusion, which requires no response. Defendants also lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

213. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

214. This paragraph characterizes and cites the APA to which Defendants refer for its complete and accurate contents.

215. This paragraph consists of a legal conclusion, which requires no response.

216. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response.

217. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents.

218. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

219. This paragraph consists of a legal conclusion, which requires no response.

The remainder of the complaint contains Plaintiff's prayer for relief, to which no response is required. To the extent a response is deemed necessary, Defendants deny that Plaintiff is entitled to any of the relief they request or any relief whatsoever.

AFFIRMATIVE DEFENSES

First Defense

Plaintiffs' claims are not ripe or prudentially ripe.

Second Defense

Plaintiffs lack standing, including prudential standing, to bring their claims.

Third Defense

The actions Plaintiffs challenge are unreviewable under the APA.

Having fully answered Plaintiffs' complaint, Defendants respectfully request that:

1. This Court enter judgment for Defendants and dismiss this action with prejudice;
2. Defendants be granted such further relief as the Court may deem just and proper.

Dated: June 1, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General
Civil Division, Federal Programs Branch

LESLEY FARBY
Deputy Director
Civil Division, Federal Programs Branch

/s/ Bridget K. O'Hickey
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Bridget O'Hickey, hereby certify that I served a true copy of the above document upon all counsel of record via this court's electronic filing system and upon any non-registered participants via first class mail.

Dated: June 1, 2025

/s/ Bridget K. O'Hickey

BRIDGET K. O'HICKEY

Counsel to the Assistant Attorney General